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ALLIS-CHALMERS MANUFACTURING COMPANY

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R. M. CASPER
GENERAL MANAGER
ATOMIC ENERGY DIVISION

July 22, 1959

Mr. Harold L. Price, Director
Division of Licensing and Regulation
U. S. Atomic Energy Commission
Washington 25, D. C.

Dear Sir:

This letter is in response to the AEC invitation for comment on the proposed amendment to the Commission's regulations pertaining to site criteria for nuclear power and test reactors as published in the Federal Register of May 23, 1959. Allis-Chalmers representatives, C. R. Braun and H. Etherington, participated in a conference of the Atomic Industrial Forum, Inc., held in New York on June 20, 1959, to discuss these proposals, and we wish to endorse the official conclusions of that conference.

We believe the listing of general factors to be considered in site selection to be highly desirable and would like to express our opinion that these are excellently presented in the proposed change; however, we feel strongly that it is too early to state quantitative rules which may be subject to misinterpretation by members of the general public. The wide difference between reactors, types of containment, etc., makes it particularly difficult to establish numerical rules, and we believe there will be a tendency to regard quantitative criteria as minimal safety requirements. This will unquestionably lead to critical scrutiny of existing and proposed power reactors, and to a serious public relations problem, or worse, in those cases where the conditions do not conform to the distances and other quantitative rules specified.

We believe also that the general public will have difficulty in distinguishing between a research reactor and a test reactor, and that there will be difficulties where research reactors may appear to violate the regulations for test reactors.

Finally, we would point out that if it should become desirable to liberalize requirements in the future, this will be more difficult if strict rules are formulated than if the requirements are understood to be criteria that are used informally by the Commission for site evaluations.

*Copy to OGC 7/24 A1158
To RDRm 7/27
Dm 24-10150
Comments*

We believe it would be most helpful if the Commission would issue a policy statement on site evaluation, outlining the information necessary and indicating when it will be required with respect to the project schedule.

We appreciate this opportunity to comment on this important problem, and we will be most happy to be of service in its solution.

Sincerely yours,

A handwritten signature in black ink, appearing to read "R. M. Campbell". The signature is written in a cursive style with a large initial "R" and a long, sweeping underline.

RMC:ar